

Koeltl, J.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORKUSDC SDNY
DOCUMENT
ELECTRONICALLY FILED
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DATE FILED: 6/10/15

APPLE MORTGAGE CORP.,

Plaintiff,

-against-

RICHARD BARENBLATT, KEITH FURER,
DAVID BREITSTEIN and KEVIN UNGAR,

Defendants.

Civil Action No. 13 CV 9233 (JGK)

**PROPOSED ORDER REGARDING
USE OF CONFIDENTIAL
DOCUMENTS AND
AUTHORIZING FILING OF
DOCUMENTS UNDER SEAL**

It is hereby STIPULATED by the parties and ORDERED by the Court, as follows:

1. **Use of Confidential Documents Produced by Parties:** The Parties herein stipulate and agree that all documents produced by them as "Confidential" pursuant to the Stipulation and Order for the Production of Confidential Information ordered by Judge Koeltl on May 1, 2014 in this action (the "Confidentiality Order") may be: (i) electronically filed in the public record as part of any papers submitted by such party in support of, or opposition to, any summary judgment motion in this action; and (ii) offered into evidence at the trial of this action without any confidentiality restriction. The Parties further stipulate and agree that except for the foregoing public electronic filing or use of "Confidential" documents at trial, the Confidentiality Order remains in full force and effect as to any documents produced by a party as "Confidential".


2. **Use of Confidential Documents Produced by Non-Parties:** With regard to any documents produced by any non-party herein as "Confidential", to the extent that such non-party agrees in writing that such documents may be electronically filed in the public record, either as

part of summary judgment submissions or at trial, subject to the continued applicability of the Confidentiality Order otherwise as to such documents, then the Parties may electronically file such documents in the public record.

3. Filing of Documents Under Seal: The Parties stipulate and agree that they may file under seal documents produced by non-parties as "Confidential" pursuant to the Confidentiality Order and for which such non-party has not otherwise agreed to the public filing of same.

4. Redacting of Documents Filed in the Public Record: The Parties stipulate and agree that they may redact, from documents electronically filed in the public record, portions of documents which they believe contain personal non-public information of non-party clients or customers. The Parties further agree that to the extent that such redacted documents are electronically filed, non-redacted versions thereof will be provided by hand to the Court.

Dated: June 8, 2015


Jonathan Rogin
BERGER & WEBB, LLP

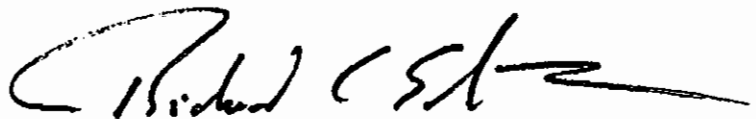
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(212) 319-1900
Attorneys for Plaintiff Apple Mortgage Corp.

SO ORDERED:


U.S.D.J.

6/9/15

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*Attorneys for Defendants Richard
Barenblatt, Keith Furer, David Breitstein
and Kevin Ungar*

SO ORDERED:

John G. Koeltl
United States District Judge